

Comments on:  
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Verizon's arguments are misleading -- LNP is necessary to give consumers, especially high-volume consumers, a practical choice of wireless providers.

Verizon's petition fails to reflect the differential costs of switching -- for low-volume individual consumers who use their wireless phone only to talk to close family, etc., switching numbers may be relatively painless. For users who give their number out widely, it's very costly to switch providers. The cost extends beyond reprinting stationery -- the cost of switching number can include losing contacts, sales, clients, or job opportunities. It's important to note the correlation of this high switching cost with high volume of usage -- the customers who are paying the largest bills, who are most profitable, and who the carriers most want to be locked in are the ones with the high switching cost right now.

Personally, I have had to fall back to using a toll-free (8XX) number for my wireless service simply so I will have the option to switch carriers. I bear this substantial cost because the alternative is too unattractive. It's not just a matter of printing new business cards and contacting family members -- my phone number needs to be given out on business cards and resumes to people who may want to reach me two or three years from now. If my number changes in that time, I will lose precious opportunities. I need number portability.

As an aside, Verizon's petition claims that the wireless industry has excellent customer service. In my personal experience, this is tremendously misleading. While I could relate many anecdotes, the best demonstration comes in looking at the contracts all major carriers ask customers to sign -- they all include very customer-unfriendly clauses including class-action waivers. Such text essentially eliminates any opportunity customers have to address major and systematic abuses. And, even worse, those contracts aren't negotiable -- when I personally pointed out the most objectionable clauses to Verizon's sales staff, I got the dismissive response: "well, you've gotta have a cell phone". The CMRS carriers aren't willing to negotiate because they know there isn't enough competition out there. Please take away this one barrier and require LNP.

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